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19 Innovation Ventures, LLC and Living Essentials, LLC

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 INNOVATION VENTURES, LLC and LIVING
23 ESSENTIALS, LLC,

24 Plaintiffs,

25 -against-

26 PITTSBURG WHOLESALE GROCERS, INC., d/b/a
27 PITCO FOODS; PACIFIC GROSERVICE, INC. d/b/a
28 PITCO FOODS; ARISTOTLE PERICLES NAVAB;
DAVID LUTTWAY; SANTA MONICA
DISTRIBUTING, INC.; MANOUCHEHR HEIKALI,
a.k.a. DAVID HEIKALI; AZIZ HEIKALI, a.k.a. ED
HEIKALI; ELITE WHOLESALE, INC.; TONIC
WHOLESALE, INC. d/b/a ACE WHOLESALE;
KOAMEX GENERAL WHOLESALE, INC.; YOUNG
H. KIM, a.k.a. YONG HWAM KIM; DAPAN USA
CORP. d/b/a FRONTIER WHOLESALE; SUNG
KEUN LEE; DAN-DEE COMPANY, INC.; FADI
ATTIQ; KEVIN ATTIQ; and JOHN DOES 1-10,

Defendants.

**[PROPOSED] EXPEDITED
DISCOVERY ORDER**

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RICHARD W. WICKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**SEALED
DISCOVERY ORDER**

WHA

12

Case No.

5523

**~~PROPOSED~~ EXPEDITED
DISCOVERY ORDER**

**FILED UNDER SEAL
PURSUANT TO 15 U.S.C.
§ 1116**

**GIVEN
COPIES MAILED TO SUBMITTING COUNSEL**

1 PLEASE TAKE NOTICE that upon the Complaint of Innovation Ventures, LLC and
2 Living Essentials, LLC (together, "Plaintiffs"), the declarations and the exhibits annexed hereto,
3 and the memorandum of law submitted in support of this Order, it is hereby:

4 ORDERED that Plaintiffs may immediately serve discovery requests on each Defendant
5 and subpoenas on any non-party believed to have information relevant to this action; and it is
6 further

7 ORDERED that (a) the Defendants to this action and any non-party served with a
8 subpoena in this action shall respond to requests to produce documents within three calendar days
9 after service of such requests by production of responsive documents; and (b) the Defendants to
10 this action shall respond to interrogatories within three calendar days after service of such
11 interrogatories; and (c) the Plaintiffs may take the deposition of any Defendant or a non-party
12 witness, upon notice in writing to every other party of at least three calendar days; and it is further

13 ORDERED, that expedited discovery shall apply to the Defendants existing as of the date
14 of this Order, and to all future Defendants to this action; and it is further

15 ORDERED, that all discovery of Defendants shall proceed on an expedited basis without
16 the need to comply with the time limits provided by the Federal Rules of Civil Procedure.

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19 UNITED STATES DISTRICT JUDGE
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